

EXHIBIT “H”

JAVIER NAVA

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1 worked for someone 24 hours a day?

2 **A. No.**

3 **Q.** Did you suffer any personal injuries as a
4 result of Mr. Groff's text messages?

5 **A.** As a consequence of the text messages,
6 damage, physical damage, no. As a consequence of how
7 he drove the truck yes. I suffered two hits in my
8 head.

9 **Q.** Please elaborate on that, Mr. Nava.

10 **A.** When Mr. Groff was driving from one place to
11 the other to attend the meetings he was driving
12 speeding and careless, reckless. When he was angry or
13 annoyed by something he would drive very fast on the
14 bumps, speeds bumps. And that caused that we hit our
15 heads.

16 **Q.** Surely you don't blame Mr. Benedetto or his
17 law firm for that; do you?

18 **MR. D'ANDREA:** Objection.

19 **Q.** You can answer the question, Mr. Nava.

20 **A.** I believe the responsible person is the
21 person that represented them and worked for them.
22 Therefore John Groff, that he was with the firm.

23 **Q.** I'm not sure if I understand your answer.
24 I'll reask the question.

25 Surely you do not believe Mr.

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1 hit to my head.

2 Q. Where was your head hit?

3 A. On the top of my head with the ceiling, the
4 top of the van.

5 Q. Is that from bouncing over the speed bumps;
6 is that how you sustained the injury?

7 A. Correct.

8 MS. FIORAVANTI: Mr. D'Andrea, can I
9 ask, are you making a claim for personal injuries as a
10 result of affair of this alleged incident?

11 MR. D'ANDREA: The complaint speaks
12 for itself. All injuries sustained are contained in
13 the complaint. We are not making anything outside of
14 that.

15 BY MS. FIORAVANTI:

16 Q. Mr. Nava, did you seek medical attention as a
17 result of these injuries?

18 A. No.

19 Q. Let's go onto any emotional or psychological
20 injuries that you sustained as a result of receiving
21 the text messages. I believe that you previously
22 stated that you received some psychological damage; is
23 that correct?

24 A. Yes.

25 Q. After receiving the text messages did you

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1 frequent because it was part of my processing and my
2 therapy.

3 Q. Did you receive any other sort of therapy
4 other than talking to Dr. Silva?

5 A. No. In spite of the two that I already
6 mentioned no.

7 Q. And you never took any medication as a result
8 of either the Pulse shooting or receiving the text
9 messages from Mr. Groff; is that correct?

10 A. No.

11 Q. Do you know whether Dr. Silva changed your
12 diagnosis after you told her that you received these
13 text messages from Mr. Groff?

14 A. No.

15 Q. As a result of the emotional injury that you
16 received from Mr. Groff's text messages, did you
17 suffer any physical manifestations?

18 A. Could you explain. I don't understand
19 physical manifestation.

20 Q. Throwing up, shaking, upset stomach?

21 A. All of those mentioned. And when we went our
22 way to the airport after experiencing all that and
23 having to be exposed to that.

24 Q. What about after the Pulse shooting, did you
25 suffer any physical manifestations?